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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

DALI WIRELESS, INC.,

Plaintiff,

V.

CORNING OPTICAL COMMUNICATIONS

LLC,

Defendant.

Case No: 3:20-cv-06469-EMC

**DALI WIRELESS, INC.'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED**

1 Pursuant to Civil Local Rules 7-11(a) and 79-5(f), Plaintiff Dali Wireless, Inc. (“Dali”)
 2 respectfully submits this Administrative Motion to Consider Whether Another Party’s Material Should
 3 Be Sealed in connection with Dali’s Opposition to Defendant’s Renewed Motion and Motion for
 4 Judgment on the Pleadings of No Willful Infringement (“Dali’s Opposition”).

5 Certain portions of Dali’s Opposition and certain documents filed as exhibits to the Szpajda
 6 Decl.¹ in support thereof contain information that Defendant Corning Optical Communications, LLC
 7 (“Corning”) has designated CONFIDENTIAL or CONFIDENTIAL ATTORNEY EYES ONLY
 8 pursuant to the parties’ Stipulated Protective Order (“Protective Order”) entered by this Court on
 9 November 10, 2021, ECF No. 63. Accordingly, Dali seeks to file under seal the documents and
 10 information as listed below:

11 Document	12 Portions to Be Filed Under Seal	13 Designating Party
12 Dali’s Opposition	13 Highlighted in yellow	14 Corning
13 Exhibit B to Szpajda Decl.	14 Entire document	15 Corning
14 Exhibit F to Szpajda Decl.	15 Entire document	16 Corning
15 Exhibit G to Szpajda Decl.	16 Entire document	17 Corning
16 Exhibit H to Szpajda Decl.	17 Entire document	18 Corning
17 Exhibit M to Szpajda Decl.	19 Entire document	20 Corning
18 Exhibit N to Szpajda Decl.	21 Entire document	22 Corning
19 Exhibit O to Szpajda Decl.	23 Entire document	24 Corning
20 Exhibit S to Szpajda Decl.	25 Entire document	26 Corning
21 Exhibit T to Szpajda Decl.	27 Entire document	28 Corning
22 Exhibit U to Szpajda Decl.		

23 Materials and documents may be provisionally filed under seal pursuant to Civil Local Rule 79-
 24 5(f) when the document, or portions thereof, “has been designated as confidential by another party or
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27 ¹ “Szpajda Decl.” refers to the Declaration of Stefan Szpajda In Support of Dali Wireless Inc.’s
 28 Opposition to Corning’s Motion for Judgment on the Pleadings of No Willful Infringement, filed
 concurrently herewith.

1 non-party.” L.R. 79-5(f). Dali has redacted the yellow-highlighted portions of its Opposition under
 2 seal only because Corning has designated the information contained therein CONFIDENTIAL and/or
 3 CONFIDENTIAL ATTORNEY EYES ONLY under the Stipulated Protective Order. Additionally, the
 4 exhibits to the Szpajda Decl. listed above were designated by Corning as containing CONFIDENTIAL
 5 and/or CONFIDENTIAL ATTORNEY EYES ONLY information under the Stipulated Protective
 6 Order. Dali takes no position on the merits of sealing Corning’s designated material and expects
 7 Corning to file one or more declarations in accordance with Local Rule 79-5(f)(3).

8 In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the above
 9 listed documents accompany this Administrative Motion. In accordance with Local Rule 79-5(c)(3),
 10 Dali has also filed a Proposed Order herewith.

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 12 Dated: March 9, 2022

/s/ Stefan Szpajda

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